

**UNITED STATES DISTRICT COURT
District of Maine**

**PAMELA ASHBY, as Personal)
Representative of the Estate of TREVOR)
SAUNDERS,)**

Plaintiff,)

v.)

**ANDROSCOGGIN COUNTY, ERIC)
SAMSON, JEFFREY CHUTE, LANE)
FELDMAN, WILLIAM GAGNE,)
TAMMY CHASE, JOHN CLEVINGER,)
PAUL HAMANN, MIRANDA)
KOLOGENSKI, JAMES LANGELIER,)
VICTORIA LANGELIER, JERRY)
LAROQUE, REBECCA LEDUC,)
BRIAN LITCHFIELD, REGINALD)
LITCHFIELD, ISAAC POLIQUIN,)
JANE DOE, and JOHN DOE,)**

Docket No. 2:25-cv-00299-LEW

Defendants.

**ANSWER AND AFFIRMATIVE DEFENSES OF DEFENDANTS ANDROSCOGGIN
COUNTY, ERIC SAMSON, JEFFREY CHUTE, LANE FELDMAN, AND WILLIAM
GAGNE**

Defendants Androscoggin County, Eric Samson, Jeffrey Chute, Lane Feldman, and William Gagne (collectively, the “County Defendants”) hereby answer and affirmatively defend the Plaintiff’s Complaint, as follows:

AFFIRMATIVE DEFENSES

A. The Plaintiff’s Complaint fails to state a cause of action upon which relief may be granted.

B. Defendants Chute, Feldman, and Gagne, in their individual capacities, are entitled to qualified immunity on the Plaintiff's claims.

C. Any damages sustained by the Plaintiff were caused by the acts and/or omissions of an individual and/or entity other than the County Defendants.

D. Any damages sustained by the Plaintiff were directly and proximately caused by a legally sufficient superseding and/or intervening cause.

E. The Plaintiff has failed to mitigate their damages as required by law.

ANSWER

Introduction

1. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 1 of the Complaint and therefore deny the same.

2. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 2 of the Complaint and therefore deny the same.

3. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 3 of the Complaint and therefore deny the same.

4. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 4 of the Complaint and therefore deny the same.

5. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 5 of the Complaint and therefore deny the same.

6. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 6 of the Complaint and therefore deny the same.

7. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 7 of the Complaint and therefore deny the same.

8. The allegation that “Defendants could not have been particularly surprised to find Trevor dead” does not require a response. To the extent that a response is required, the County Defendants deny the allegation. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the remaining allegations contained in Paragraph 8 of the Complaint and therefore deny the same.

9. Paragraph 9 of the Complaint states a legal conclusion for which no response is required. To the extent that a response is required, the County Defendants deny the allegation.

10. The County Defendants deny the allegation contained in Paragraph 10 of the Complaint.

11. The allegation contained in Paragraph 11 does not require a response. To the extent that a response is required, the County Defendants deny the allegation.

Parties

12. The County Defendants admit the allegation contained in Paragraph 12 of the Complaint.

13. The County Defendants admit the allegation contained in Paragraph 13 of the Complaint.

14. The County Defendants deny that Eric Samson was an employee of Androscoggin County during the times relevant to the Complaint because he was an elected official. The County Defendants admit the remaining allegations contained in Paragraph 14 of the Complaint.

15. The County Defendants admit the allegation contained in Paragraph 15 of the Complaint.

16. The County Defendants admit the allegation contained in Paragraph 16 of the Complaint.

17. The County Defendants admit the allegation contained in Paragraph 17 of the Complaint.

18. The County Defendants admit the allegation contained in Paragraph 18 of the Complaint.

19. The County Defendants admit the allegation contained in Paragraph 19 of the Complaint.

20. The County Defendants admit the allegation contained in Paragraph 20 of the Complaint.

21. The County Defendants admit the allegation contained in Paragraph 21 of the Complaint.

22. The County Defendants admit the allegation contained in Paragraph 22 of the Complaint.

23. The County Defendants admit the allegation contained in Paragraph 23 of the Complaint.

24. The County Defendants admit the allegation contained in Paragraph 24 of the Complaint.

25. The County Defendants admit the allegation contained in Paragraph 25 of the Complaint.

26. The County Defendants admit the allegation contained in Paragraph 26 of the Complaint.

27. The County Defendants admit the allegation contained in Paragraph 27 of the Complaint.

28. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 28 of the Complaint and therefore deny the same.

29. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 29 of the Complaint and therefore deny the same.

Jurisdiction and Venue

30. The County Defendants admit that this court has jurisdiction over federal questions pursuant to 28 U.S.C. §§ 1331 and 1343 and 42 U.S.C. §§ 1983 and 1988.

31. The County Defendants admit that venue is proper in the District of Maine.

Factual Background

32. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 32 of the Complaint and therefore deny the same.

33. The County Defendants deny the allegations contained in Paragraph 33 of the Complaint.

34. The County Defendants deny the allegations contained in Paragraph 34 of the Complaint.

35. The County Defendants deny the allegations contained in Paragraph 35 of the Complaint.

36. The County Defendants deny the allegations contained in Paragraph 36 of the Complaint.

37. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 37 of the Complaint and therefore deny the same.

38. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 38 of the Complaint and therefore deny the same.

39. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 39 of the Complaint and therefore deny the same.

40. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 40 of the Complaint and therefore deny the same.

41. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 41 of the Complaint and therefore deny the same.

42. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 42 of the Complaint and therefore deny the same.

43. Paragraph 43 states a legal conclusion for which no response is required. To the extent that a response is required, the County Defendants deny the allegation.

44. The County Defendants deny the allegations contained in Paragraph 44 of the Complaint.

45. The County Defendants deny the allegations contained in Paragraph 45 of the Complaint.

46. The County Defendants deny the allegations contained in Paragraph 46 of the Complaint.

47. The County Defendants deny the allegations contained in Paragraph 47 of the Complaint.

48. The County Defendants deny the allegations contained in Paragraph 48 of the Complaint.

49. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 49 of the Complaint and therefore deny the same.

50. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 50 of the Complaint and therefore deny the same.

51. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 51 of the Complaint and therefore deny the same.

52. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 52 of the Complaint and therefore deny the same.

53. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 53 of the Complaint and therefore deny the same.

54. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 54 of the Complaint and therefore deny the same.

55. The County Defendants deny the allegations contained in Paragraph 55 of the Complaint.

56. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 56 of the Complaint and therefore deny the same.

57. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 57 of the Complaint and therefore deny the same.

58. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 58 of the Complaint and therefore deny the same.

59. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 59 of the Complaint and therefore deny the same.

60. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 60 of the Complaint and therefore deny the same.

61. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 61 of the Complaint and therefore deny the same.

62. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 62 of the Complaint and therefore deny the same.

63. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 63 of the Complaint and therefore deny the same.

64. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 64 of the Complaint and therefore deny the same.

65. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 65 of the Complaint and therefore deny the same.

66. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 66 of the Complaint and therefore deny the same.

67. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 67 of the Complaint and therefore deny the same.

68. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 68 of the Complaint and therefore deny the same.

69. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 69 of the Complaint and therefore deny the same.

70. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 70 of the Complaint and therefore deny the same.

71. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 71 of the Complaint and therefore deny the same.

72. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 72 of the Complaint and therefore deny the same.

73. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 73 of the Complaint and therefore deny the same.

74. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 74 of the Complaint and therefore deny the same.

75. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 75 of the Complaint and therefore deny the same.

76. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 76 of the Complaint and therefore deny the same.

77. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 77 of the Complaint and therefore deny the same.

78. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 78 of the Complaint and therefore deny the same.

79. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 79 of the Complaint and therefore deny the same.

80. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 80 of the Complaint and therefore deny the same.

81. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 81 of the Complaint and therefore deny the same.

82. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 82 of the Complaint and therefore deny the same.

83. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 83 of the Complaint and therefore deny the same.

84. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 84 of the Complaint and therefore deny the same.

85. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 85 of the Complaint and therefore deny the same.

86. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 86 of the Complaint and therefore deny the same.

87. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 87 of the Complaint and therefore deny the same.

88. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 88 of the Complaint and therefore deny the same.

89. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 89 of the Complaint and therefore deny the same.

90. The County Defendants deny the allegation that they “ignored Trevor’s pleas.” The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the remaining allegations contained in Paragraph 90 of the Complaint and therefore deny the same.

91. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 91 of the Complaint and therefore deny the same.

92. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 92 of the Complaint and therefore deny the same.

93. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 93 of the Complaint and therefore deny the same.

94. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 94 of the Complaint and therefore deny the same.

95. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 95 of the Complaint and therefore deny the same.

96. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 96 of the Complaint and therefore deny the same.

97. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 97 of the Complaint and therefore deny the same.

98. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 98 of the Complaint and therefore deny the same.

99. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 99 of the Complaint and therefore deny the same.

100. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 100 of the Complaint and therefore deny the same.

101. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 101 of the Complaint and therefore deny the same.

102. The County Defendants deny that “inmates are forced to urinate or defecate into a grate on the cell floor.” The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the remaining allegations contained in Paragraph 102 of the Complaint and therefore deny the same.

103. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 103 of the Complaint and therefore deny the same.

104. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 104 of the Complaint and therefore deny the same.

105. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 105 of the Complaint and therefore deny the same.

106. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 106 of the Complaint and therefore deny the same.

107. The County Defendants deny the allegations contained in Paragraph 107 of the Complaint.

108. The County Defendants deny the allegations contained in Paragraph 108 of the Complaint.

109. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 109 of the Complaint and therefore deny the same.

110. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 110 of the Complaint and therefore deny the same.

111. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 111 of the Complaint and therefore deny the same.

112. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 112 of the Complaint and therefore deny the same.

113. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 113 of the Complaint and therefore deny the same.

114. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 114 of the Complaint and therefore deny the same.

115. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 115 of the Complaint and therefore deny the same.

116. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 116 of the Complaint and therefore deny the same.

117. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 117 of the Complaint and therefore deny the same.

118. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 118 of the Complaint and therefore deny the same.

119. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 119 of the Complaint and therefore deny the same.

120. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 120 of the Complaint and therefore deny the same.

121. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 121 of the Complaint and therefore deny the same.

122. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 122 of the Complaint and therefore deny the same.

123. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 123 of the Complaint and therefore deny the same.

124. The County Defendants deny the allegations contained in Paragraph 124 of the Complaint.

125. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 125 of the Complaint and therefore deny the same.

126. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 126 of the Complaint and therefore deny the same.

127. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 127 of the Complaint and therefore deny the same.

128. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 128 of the Complaint and therefore deny the same.

129. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 129 of the Complaint and therefore deny the same.

130. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 130 of the Complaint and therefore deny the same.

131. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 131 of the Complaint and therefore deny the same.

132. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 132 of the Complaint and therefore deny the same.

133. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 133 of the Complaint and therefore deny the same.

134. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 134 of the Complaint and therefore deny the same.

135. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 135 of the Complaint and therefore deny the same.

136. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 136 of the Complaint and therefore deny the same.

137. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 137 of the Complaint and therefore deny the same.

138. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 138 of the Complaint and therefore deny the same.

139. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 139 of the Complaint and therefore deny the same.

140. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 140 of the Complaint and therefore deny the same.

141. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 141 of the Complaint and therefore deny the same.

142. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 142 of the Complaint and therefore deny the same.

143. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 143 of the Complaint and therefore deny the same.

144. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 144 of the Complaint and therefore deny the same.

145. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 145 of the Complaint and therefore deny the same.

146. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 146 of the Complaint and therefore deny the same.

147. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 147 of the Complaint and therefore deny the same.

148. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 148 of the Complaint and therefore deny the same.

149. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 149 of the Complaint and therefore deny the same.

150. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 150 of the Complaint and therefore deny the same.

151. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 151 of the Complaint and therefore deny the same.

152. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 152 of the Complaint and therefore deny the same.

153. The County Defendants deny the allegation that William Gagne lied to or actively misled the Plaintiff. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the remaining allegations contained in Paragraph 153 of the Complaint and therefore deny the same.

154. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 154 of the Complaint and therefore deny the same.

155. The County Defendants are without sufficient knowledge or information so as to form a belief about the truth of the allegations contained in Paragraph 155 of the Complaint and therefore deny the same.

COUNT I
(14 U.S.C. § 1983/Eighth Amendment Violation/Official Capacity)

156. The County Defendants repeat and reallege the preceding paragraphs.

157. Paragraph 157 of the Complaint states a legal conclusion for which no response is required. To the extent that a response is required, the County Defendants deny the allegation.

158. The County Defendants deny the allegations contained in Paragraph 158 of the Complaint.

159. The County Defendants deny the allegations contained in Paragraph 159 of the Complaint.

160. The County Defendants deny the allegations contained in Paragraph 160 of the Complaint.

161. The County Defendants deny the allegations contained in Paragraph 161 of the Complaint.

COUNT II
(14 U.S.C. § 1983/Eighth Amendment Violation/Individual Capacity)

162. The County Defendants repeat and reallege the preceding paragraphs.

163. Paragraph 163 of the Complaint states a legal conclusion for which no response is required. To the extent that a response is required, the County Defendants deny the allegation.

164. The County Defendants deny the allegations contained in Paragraph 164 of the Complaint.

165. The County Defendants deny the allegations contained in Paragraph 165 of the Complaint.

166. The County Defendants deny the allegations contained in Paragraph 166 of the Complaint.

167. The County Defendants deny the allegations contained in Paragraph 167 of the Complaint.

CONCLUSION

Based upon the above, the County Defendants respectfully request judgment in their favor against the Plaintiff on all counts of the Complaint, plus costs, interest, and attorney's fees.

Dated: July 2, 2025

/s/ Peter T. Marchesi
Peter T. Marchesi, Esq.

/s/ Michael D. Lichtenstein
Michael D. Lichtenstein, Esq.

Wheeler & Arey, P.A.

Attorneys for Defendants Androscoggin
County, Eric Samson, Jeffrey Chute, Lane
Feldman, and William Gagne
27 Temple Street
Waterville, ME 04901

**UNITED STATES DISTRICT COURT
District of Maine**

**PAMELA ASHBY, as Personal)
Representative of the Estate of TREVOR)
SAUNDERS,)**

Plaintiff,)

v.)

ANDROSCOGGIN COUNTY, et al.)

Defendants.)

Docket No. 2:25-cv-00299-LEW

CERTIFICATE OF SERVICE

I, Michael Lichtenstein, hereby certify that:

- Answer and Affirmative Defenses of Defendants Androscoggin County, Eric Samson, Jeffrey Chute, Lane Feldman, and William Gagne

has been served this day on Plaintiff by filing with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

Taylor Asen, Esq.
Rosalie Wennberg, Esq.

service@gideonasenlaw.com
service@gideonasenlaw.com

Dated: July 2, 2025

/s/ Michael D. Lichtenstein
Michael D. Lichtenstein, Esq.

Wheeler & Arey, P.A.
Attorneys for Defendants Androscoggin
County, Eric Samson, Jeffrey Chute, Lane
Feldman, and William Gagne
27 Temple Street
Waterville, ME 04901